

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

ROBERT A. STANARD,

Defendant.

NO. CR16-0320 RSM

**GOVERNMENT'S EMERGENCY
MOTION FOR EXTENSION OF TIME
TO FILE A RESPONSE TO
DEFENDANT'S MOTION FOR
RELIEF UNDER
18 U.S.C. § 3582(c)(1)(A)**

Noted: May 13, 2022

The United States moves for an extension of time of fourteen days to file its response to Defendant Robert A. Stanard's *pro se* motion for a reduction in sentence under 18 U.S.C. § 3582(c)(1)(A). The defendant is currently serving the 84-month custodial sentence that this Court imposed following his conviction for being a felon in possession of a firearm. According to the Bureau of Prisons (BOP), his projected release date is January 5, 2023

On May 4, 2022, by ECF email, the government received notice of Stanard's *pro se* motion. To respond to the motion, counsel for the United States has requested the relevant records from the Bureau of Prisons. In addition, counsel has alerted the Federal Public Defender to the filing and provided him with a copy of the *pro se* motion so that he can determine if counsel should be appointed under this Court's General Order 03-19. That General Order provides for appointment of the Federal Public Defender's Office or CJA

Government's Motion for Extension of Time to Respond to Motion
for Compassionate Release

United States v. Stanard, CR16-0320 RSM - 1

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1 counsel for defendants filing a request for compassionate release under 18 U.S.C.
2 § 3582(c)(1)(A).

3 To allow sufficient time to address the question of whether counsel should be
4 appointed, and to locate counsel as appropriate, as well as to obtain the necessary
5 documents from the Bureau of Prisons, this motion seeks a two-week extension of time
6 until May 25, 2022, for filing the response to the *pro se* motion. If counsel is appointed,
7 an effort will be made to reach agreement on a briefing schedule that provides counsel for
8 the defendant time to file a supplemental or amended motion, and a date thereafter for the
9 government's response.

10 Accordingly, the United States respectfully requests an extension of fourteen days
11 of the deadline to file a response to defendant's motion for compassionate release.

12 May 5, 2022.

13 Respectfully submitted,

14 NICHOLAS W. BROWN
15 United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and to be served on the Defendant, Robert Stanard, who is proceeding *pro se*, by First Class Mail to the following address:

Robert A. Stanard, Registration No. 08757-081
FCI Sheridan
Federal Correctional Institution
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/s/ John M. Price
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